

Exhibit A

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION PLAINTIFFS' RESPONSES TO DEFENDANT REBECCA N.
SULLIVAN'S FIRST INTERROGATORIES**

In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, the Coalition for Good Governance, Megan Missett, Ricardo Davis, Laura Digges, and Williams Digges (the “Coalition Plaintiffs”), by and through counsel, hereby collectively respond and object to Defendant Rebecca N. Sullivan’s First Interrogatories to Coalition Plaintiffs, served December 29, 2020.

OBJECTIONS TO DEFINITIONS

Coalition Plaintiffs object to this Interrogatory’s definitions of “Election System” and “Complaint.” Both refer to “your Third Amended Complaint [Doc. 627],” which is a complaint from the Curling Plaintiffs, not the Coalition Plaintiffs. For these Interrogatories, Coalition Plaintiffs will assume those definitions instead refer to Coalition Plaintiffs’ First Supplemental Amended Complaint [Doc. 628].

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 1:

If you contend that malware of any kind was inserted into the Election System prior to or during the November 3, 2020 General Election, please:

- a. Describe the malware;
- b. Identify the person(s) responsible for inserting the malware into the system;
- c. Identify the component of the Election System into which the malware was inserted:
 - i. Voter Access card
 - ii. Touchscreen
 - iii. Printer for paper ballot
 - iv. Scanner
 - v. Electronic Pollbook, or
 - vi. Other
- d. Identify the precinct(s) where the malware was inserted;
- e. State when the malware was inserted into the Election System;
- f. Describe how the malware was inserted into the Election System;
- g. State what impact the insertion of Malware had on the outcome of each race in the November 3, 2020 election;

- h. Identify all persons with knowledge of the alleged insertion of malware into the Election System; and
 - i. Identify all documents supporting your contention.

Response from Coalition Plaintiffs:

Coalition Plaintiffs have not contended that malware “was inserted into the Election system prior to or during the November 3, 2020 General Election.” However, Coalition does intend to utilize ongoing discovery to identify whether malware has been inserted, to the extent possible, and Coalition reserves the right to introduce evidence of any malware identified through discovery in support of its allegations and claims. Defendants have thus far strenuously resisted producing equipment and documents that would permit discovery on this issue, which is litigation conduct that tends to support an objective inference that Defendants know or suspect that such malware exists.

Interrogatory No. 2:

If you contend that the Election System malfunctioned in any way in connection with the November 3, 2020 General Election, please:

- a. Describe the malfunction;
- b. State whether the malfunction affected the outcome(s) of any election held on November 3, 2020 and, if so, how it affected the outcome;
- c. Identify the Precinct in which the malfunction occurred;

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

Civil Action No. 1:17-CV-2989-AT

**COALITION FOR GOOD GOVERNANCES' RESPONSES TO
DEFENDANT DAVID J. WORLEY'S FIRST INTERROGATORIES**

In accordance with Rules 26 and 33 of the Federal Rules of Civil Procedure, the Coalition for Good Governance (“Coalition”), by and through counsel, hereby respond and object to Defendant David J. Worley’s First Interrogatories to Coalition, served December 30, 2020.

OBJECTIONS TO DEFINITIONS

Coalition object to this Interrogatory’s definitions of “Election System” and “Complaint.” Both refer to “your Third Amended Complaint [Doc. 627],” which is a complaint from the Curling Plaintiffs, not the Coalition. For these Interrogatories, Coalition will assume those definitions instead refer to Coalition’ First Supplemental Amended Complaint [Doc. 628].

RESPONSES AND OBJECTIONS TO INTERROGATORIES

Interrogatory No. 1:

Coalition has answered this Interrogatory in Coalition's response to the above Interrogatory No. 6, and given examples of counties where votes were switched from one candidate to another depending on the method of counting. The documents supporting this contention are publicly available, and also already in State Defendants' possession. It would be burdensome for Coalition to compile every instance of such switching for the State Defendants. The people with knowledge of these problems would include county election officials, precinct managers, and State Defendants themselves.

Interrogatory No. 10:

If you contend that the Election System was hacked in any way before or during the election held on November 3, 2020, please:

- a. Identify the person(s) who hacked into the Election System;
- b. Identify the component of the Election System which you contend was hacked:
 - i. Voter Access card
 - ii. Touchscreen
 - iii. Printer for paper ballot
 - iv. Scanner
 - v. Electronic Pollbook, or
 - vi. Other

- c. Identify the precinct(s) in which the hacking occurred;
- d. State when the hacking occurred;
- e. Describe how the hacking was accomplished;
- f. State what impact the hacking had on the outcome of any election held on November 3, 2020; and
- g. Identify all persons with knowledge of the alleged hacking.

Response from Coalition:

Coalition is not contending that the November 2020 election was hacked.

This 27th day of January, 2021.

/s/ Bruce P. Brown
Bruce P. Brown
Georgia Bar No. 064460
BRUCE P. BROWN LAW LLC
1123 Zonolite Rd. NE
Suite 6
Atlanta, Georgia 30306
(404) 881-0700

/s/ Robert A. McGuire, III
Robert A. McGuire, III
Admitted Pro Hac Vice
(ECF No. 125)
ROBERT MC GUIRE LAW FIRM
113 Cherry St. #86685
Seattle, Washington 98104-2205
(253) 267-8530

Counsel for Coalition for Good Governance